

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

**WILLIAM DEAN, individually, on  
behalf of himself and all others similarly  
situated,**

**Plaintiff,**

**v.**

**CITY OF MONTICELLO,  
MINNESOTA,**

**Defendant.**

**Civ. No. 14-cv-00376 (DFW/JSM)**

**PLAINTIFF'S MOTION TO PRELIMINARILY APPROVE  
SETTLEMENT, CERTIFY A CLASS FOR SETTLEMENT PURPOSES,  
APPROVE THE PARTIES' NOTICE PLAN AND SCHEDULE A FINAL  
FAIRNESS HEARING**

Plaintiff William Dean ("Plaintiff") respectfully submits this Motion pursuant to Fed. R. Civ. P. 23 and supporting Memorandum for an Order: (1) preliminarily approving the negotiated settlement of Plaintiff's claims; (2) conditionally certifying a settlement class pursuant to Fed. R. Civ. P. 23; (3) approving the proposed Notice Plan, and (4) setting a Final Fairness Hearing date. The Settlement Agreement and Release, including the proposed form of Notice, is submitted herewith.

Dated: April 11, 2014

By: s/ Archana Nath

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